

REMARKS

The Applicants thank the Examiner for his timely and careful reconsideration of the application. In light of the Examiner's comments in the Final Office Action, which clarified the Examiner's position on the previously amended claims, the Applicants submit further amendments and remarks as discussed in detail below.

Claim 12 has been amended for clarity, and to recite features of an embodiment of the invention in a manner which better reflects the disclosure of such features and their effects in the specification. Claim 12, for example, has been amended to recite dedicated connections and an effect of such dedicated connections, namely to guarantee routing of video and key signals between the processing elements of the digital video effects processor and the keyers, the mixers, the effects devices, and the routing elements. The claim has also been amended to consistently refer to "one or more" keyers, mixers, and effects devices. Claim 16 has been amended in a similar manner to refer to "one or more" keyers. New claims 23 to 31 have been added.

With reference now to the Final Office Action, claims 12 to 22 were rejected under 35 USC 102(e) as allegedly being anticipated by United States Patent No. 5,982,456 (hereinafter "Smith").

Regarding claim 12, item 4 on page 3 of the Final Office Action correctly noted that former claim 12 referred to a dedicated connection, whereas pages 5 and 6 of the Applicants' communication filed on November 27, 2007 presented remarks on the basis of a direct connection. The Applicants apologize for this oversight. Former claim 12 recited a dedicated connection, and claim 12 as amended also recites a similar feature in the form of dedicated connections. It is respectfully submitted that Smith fails to disclose at least this feature.

The Final Office Action points to a description of the Digital Video Effects (DVE) unit 30 of Smith as allegedly disclosing the claimed integrated digital video effects processor having processing elements, to a description of the control processor 18 of Smith as allegedly disclosing the claimed one or more keyers, to elements 24 and 38 of Smith as allegedly disclosing the claimed one or more mixers, again to elements 24 and 38 and also to element

36 of Smith as allegedly disclosing the claimed one or more effects devices, and to the network card 28, the PCI bus 32, the Movie2 bus 34 and the switching unit 12 of Smith as allegedly disclosing the claimed routing elements. According to pages 2 and 3 of the Office Action, the DVE unit 30, the PCI bus 32, the Movie2 bus 34, and the network card 28 allegedly disclosed the previously claimed dedicated connection from the keyers, the mixers, the effects devices, and the routing elements to the processing elements of the digital video effects processor.

The Applicants respectfully submit that Smith does not disclose or suggest at least the presently claimed dedicated connections. Although Smith may disclose in very general terms that all of the elements shown in Figure 1 exist in one physical box, the cited reference does not disclose any dedicated connection between the DVE unit 30 and the internal mixing and keying elements. For example, the PCI bus 32 and the Movie2 bus 34 of Smith cannot reasonably be characterized as dedicated connections. The Movie2 bus 34 is open-ended in Figure 1, and therefore clearly is intended to connect to other components. This bus is therefore not a dedicated connection. The PCI bus 32 is similarly open-ended at its right-hand end, and is connected to the memory 21 and to the general purpose processor 22 at its left-hand end. The elements 21 and 22 are clearly not digital video effects processors, keyers, mixers, effects devices, or routing elements, and therefore the PCI bus 32 of Smith also cannot be characterized as a dedicated connection as recited in amended claim 12.

Smith therefore fails to disclose at least the limitation “wherein the digital video effects processor has dedicated connections from the one or more keyers, the one or more mixers, the one or more effects devices, and the routing elements to the processing elements of the digital video effects processor”, as explicitly recited in independent claim 12.

Thus, in summary, Smith appears to disclose a collection of devices on a shared bus. This implementation does not provide dedicated connections as recited in claim 12 and shown, for example, in Figure 2 of the present application at 94, 95, 96, and 97.

The shared bus of Smith also does not guarantee routing of video and key signals, as now explicitly recited in amended independent claim 12.

It is respectfully submitted that claim 12, as well as its dependent claims 13 to 22, recite features which have not been disclosed in Smith, and accordingly there is no anticipation. Reconsideration and withdrawal of the claim rejections under 35 USC 102 are respectfully requested.

The foregoing remarks are based primarily on distinguishing features which appear in the amended independent claim 12. The Applicants hereby expressly reserve the right to present further remarks on the basis of other distinguishing features, should this prove necessary as examination proceeds.

The Applicants have also taken this opportunity to present a new independent claim 23 and new dependent claims 24 to 31 for consideration by the Examiner. The new independent claim 23 is intended to convey the concept of a digital video effects (DVE) processor as an integrated element of a multi-level effects (MLE) device. A video production switcher comprising the elements recited in claim 23 is believed to be both novel and inventive over Smith. The claimed switcher avoids the use of an auxiliary bus by integrating a DVE processor into an MLE device, thereby avoiding the disadvantages associated with use of an auxiliary bus in combination with an external DVE processor. Paragraphs [0006], [0007], and [0010] of the published version of the present application describe some disadvantages of occupying an auxiliary bus for DVE operations, and paragraph [0022], for example, describes the integration of a DVE processor with an MLE device.

Dependent claim 24 recites the feature of a digital video effects processor implemented as a pluggable option module, and the new dependent claims 25 to 31 are based on claims 13 to 19, respectively.

It is believed that both the presently submitted amended claims and new claims 23 to 31 are allowable. In the event that any issues remain to be resolved prior to allowance of the application, the Examiner is invited to contact the undersigned by telephone so as to most expediently resolve such issues.

Early and favorable consideration of the application are earnestly solicited.

Respectfully submitted,

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